

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MELISSA CHRUM, individually and on behalf : 1:24-cv-02163-GHW-GS  
of all others similarly situated, :  
: Plaintiff, : ECF Case  
: :  
v. :  
: NFL ENTERPRISES LLC, :  
: :  
Defendant. :----- x

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon its supporting memorandum of law; the declaration of Ashley Downey dated May 22, 2024, and accompanying exhibit; and all other papers and prior proceedings in this matter, Defendant NFL Enterprises LLC (the “NFL”), by and through its undersigned counsel, moves this Court, before the Honorable Gary Stein, United States Magistrate Judge, at 500 Pearl Street, New York, New York 10007, on a date and time designated by the Court for an Order pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.*, (i) compelling arbitration of the claims asserted by Plaintiff Melissa Chrum against the NFL in the Complaint; (ii) staying this action pending the outcome of any arbitration; and (iii) granting the NFL such other and further relief as the Court deems just and proper.

Dated: New York, New York  
May 22, 2024

Respectfully submitted,

/s/ Michael W. McTigue Jr.

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